

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET
FOR THE PERIOD AUGUST 1 TO AUGUST 11, 2023

Debtor: LTL Management LLC

Applicant: **Blake, Cassels & Graydon LLP**

Case No.: 23-12825-MBK

Client: LTL Management LLC (“LTL”)

Chapter: 11

Case Filed: April 4, 2023 (the “Petition Date”)

SECTION 1
FEE SUMMARY

☐ Interim Fee Application No. _____ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from August 1 to 11, 2023 (the “Fifth Statement Period”).

Total Fees:	CAD
	\$6,702.70
Total Disbursements:	\$0.00
Total Fees and Disbursements:	\$6,702.70
Minus 20% Holdback of Fees:	(\$1,340.54)
Amount Sought at this Time:	\$5,362.16

	<u>FEES</u>	<u>EXPENSES</u>
Total Previously Requested:	\$288,504.30	\$1,260.00
Total Allowed to Date:	\$0.00	\$0.00
Total Retainer (If Applicable) ¹ :		
Total Holdback (If Applicable):	(\$57,700.86)	\$0.00
Total Received by Applicant ² :	\$0.00	\$0.00

¹ Reconciliation of the pre-dismissal amounts and post-dismissal amounts received from LTL will be provided in Blakes’ Final Fee Application.

² Payment of the permitted 80% of fees and 100% of disbursements is anticipated to be deducted from the pre-dismissal amounts and post-dismissal amounts, to the extent any such amounts are available, once the objection period for the relevant monthly fee statement has expired.

Name of Professional & Title	Year Admitted	Hours	Rate (CAD)	Fees (CAD)
Gordon McKee Partner, Litigation & Dispute Resolution (Toronto)	1988	0.2	\$1,070.00	\$214.00
Linc Rogers Partner, Restructuring & Insolvency (Toronto)	2000	3.7	\$913.00	\$3,378.10
Caitlin McIntyre Associate, Restructuring & Insolvency (Toronto)	2017	4.4	\$664.00	\$2,921.60
Nancy Thompson Law Clerk, Restructuring & Insolvency (Toronto)	N/A	0.5	\$378.00	\$189.00

Blended Hourly Rate: [Excluding Nancy Thompson and Filing Clerks]				\$784.78
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**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEES (CAD)
1. Litigation Consulting: CCAA Recognition Proceeding Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	8.3	\$6,513.70
2. Fee and Retention Application Preparation of employment and fee applications for self or others; motions to establish interim procedures	0.5	\$189.00
3. Litigation: Canadian Actions Other than Avoidance Action Litigation		
8. Litigation: General / All Class Actions Other than Avoidance Action Litigation		
SERVICE TOTALS:	8.8	\$6,702.70

Note: Fees for No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION III
SUMMARY OF DISBURSEMENTS**

Matter No.	DISBURSEMENTS	AMOUNT (CAD)
	N/A	
	DISBURSEMENTS TOTALS	

Note: Disbursements for matter No. 3 are allocated 33.33% to LTL and 66.67% to J&J, which allocation is reflected in the breakdown of amounts set out on page 1

**SECTION IV
CASE HISTORY**

1. Date of Retention: June 15, 2023, effective as of the Petition Date [Dkt. 791] (the “Retention Order”).³
2. Summary explaining the nature of the work performed and the results achieved:
 - Monitoring the Chapter 11 proceeding, virtually attending the omnibus hearing on August 2, and considering impact on the CCAA recognition proceeding;
 - Communication with US counsel and counsel to the Information Officer regarding status of the CCAA recognition proceeding and considering next steps; and
 - Providing comments on correspondence from the Information Officer to counsel to the TCC and related communication with the Information Officer.

I certify under penalty of perjury that the above is true.

Date: September 8, 2023

/s/ Linc Rogers

Linc Rogers

Blake, Cassels & Graydon LLP

³ The Retention Order is attached hereto as Exhibit A.